



**U.S. Department of Justice  
United States Attorney's Office  
Middle District of Alabama**

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July 12, 2021

**VIA ELECTRONIC MAIL**

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Re: United States v. William Lee Holladay, III, et al., No. 2:21-CR-49-MHT-JTA  
(M.D. Ala.) – Notice of service of trial subpoena on E. Shane Black, Esq.

Dear Counsel:

We write to advise you that on June 8, 2021, Special Agent Chris Maisano of the United States Department of Education – Office of Inspector General served a subpoena on E. Shane Black, an attorney who, during the relevant period, served as counsel to the Athens City Board of Education. The subpoena requested testimony at the trial scheduled in this case. It also sought pertinent documents.

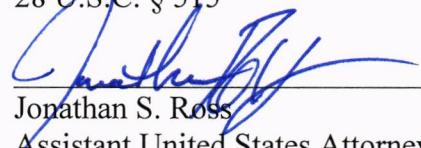
I am providing you this notice as a courtesy and not out of any obligation. The government contends that any privilege that might exist involving Mr. Black is held by the Athens City Board of Education and may be waived by that board. Additionally, it is the government's view that the crime fraud exception to the attorney-client privilege applies and overcomes any privilege that may exist if the board does not decide to waive the privilege.

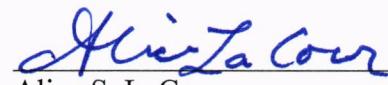
GOVERNMENT  
EXHIBIT

Please do not hesitate to contact me if you have any questions about this matter.

Respectfully yours,

VERNE H. SPEIRS  
Attorney for the United States,  
Acting under Authority Conferred by  
28 U.S.C. § 515

  
\_\_\_\_\_  
Jonathan S. Ross  
Assistant United States Attorney

  
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Alice S. LaCour  
Assistant United States Attorney